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January 27, 2003

TN REGULATORY AUTHORITY
DOCKET ROOM

MARK A. MAYHEW

*ALSO ADMITTED IN GA

Sara Kyle, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Via Hand Delivery

Re: In re: Complaint of Aeneas Communications Against Citizens Communications in
Weakley County, Tennessee

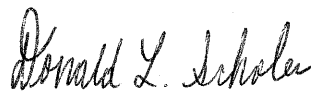
Docket No. 02-00438

Dear Chairman Kyle:

Enclosed for filing are the original and fourteen copies of the NTCH - West Tenn, Inc.'s Response to Supplemental Discovery Request of Aeneas Communications to NTCH - West Tenn, Inc. in the above-captioned proceeding. Please return one stamped copy to me.

Thank you for your assistance in this matter.

Sincerely yours,



DONALD L. SCHOLLES

Enclosures

c: Jonathan Wike
Henry Walker
Guilford F. Thornton, Jr.
James Wright
Sean P. Farrell

BKSJ File No.: 02-543

**BEFORE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

In Re: Aeneas Communications, LLC, Petitioner,)	
Against Citizens Communications)	Docket No. 02-00438
Company of Tennessee, LLC, Respondent.)	

**RESPONSE TO SUPPLEMENTAL DISCOVERY REQUEST OF AENEAS
COMMUNICATIONS TO NTCH-WEST TENNESSEE INC. ("NTCH")**

Aeneas Communications ("Aeneas") submits the following supplemental discovery requests to NTCH-West Tennessee Inc. ("NTCH") in the above-captioned proceeding.

Preliminary Matters and Definitions

When not otherwise specified the term "NTCH" refers to NTCH-West Tennessee Inc. and/or to any affiliated corporate entity, engaging in the offering of regulated telephone services. With respect to each of the following interrogatories, in addition to supplying the information requested, please identify any and all documents that support, refer to, or evidence the subject matter of each interrogatory in your answers thereto. If any or all of the documents identified herein are no longer in your possession, custody or control because of destruction, loss, or other reason, then you are requested to identify each such document fully, including the nature and type of the document, its date, the identity of the person who prepared the document, and the identity of the person or entity for whom it was prepared, and to the extent possible, you are requested to summarize the contents of the document and state the manner and date of the disposition thereof. If any of the requested documents are objected to or not produced on the basis of privilege, please include in your response the production, for each document, a written statement evidencing:

- a. The nature and type of the document;
- b. The date;
- c. The author of the document;
- d. The recipient;
- e. The sender; and
- f. A brief description of the contents sufficient to allow the TRA to rule on a motion to compel.

Consistent with the preceding definitions and preliminary matters, answer under oath the following discovery requests.

INTERROGATORIES

1. Based on the circumstances set forth in the February 11, 2001, memorandum from TRA staffer Lewis De Board (copy attached), please explain NTCH's position concerning the proper routing of calls from an end user located in Weakly County served by Citizens Communications (Citizens) to an end user also located in Weakly County but who is in the service area of BellSouth Telecommunications, Inc. "BellSouth" and receives service from Aeneas. Does NTCH believe that citizens should route such traffic to a BellSouth tandem or to a BellSouth end office?

ANSWER:

NTCH believes that Citizens should route such traffic to a BellSouth tandem. For carriers who have an interconnection agreement with Citizens, NTCH believes that Citizens should allow a single point of interconnection to the Citizens network, rather than requiring

multiple points of interconnection, i.e., separate trunking to each Citizens end office, even if such end offices are only a short distance apart.

2. Does NTCH believe that the Local Exchange Routing Guide ("LERG") directly or indirectly address the issues raised in Question 1? If so, please identify the relevant portions of the LERG, explain how these portions address the issues, and provide a copy of any relevant language from the LERG.

ANSWER:

NTCH believes that the LERG does address the issues. The LERG shows where every exchange should be routed. Each exchange is homed out of a particular switch. Citizens' routing appears to cause call failures.

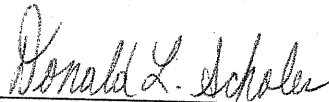
3. Identify and provide any other source of information or policy consideration relied upon by NTCH in responding to Question 1.

ANSWER:

NTCH's position is based on the policy articulated in the Tennessee Regulatory Authority's internal memorandum dated February 11, 2001, i.e., "use of a tandem switch is necessary for calls to be transferred to a CLEC absent interconnection agreements because tandem switches are gateways between Incumbent Local Exchange Carriers and other telecommunications service providers." NTCH believes that a local carrier's refusal to route traffic on a tandem (in the absence of an interconnection agreement) constitutes anticompetitive behavior because it affects costs and service quality, and ultimately harms the public interest by

depriving customers of choices and the best possible service at reasonable rates. NTCH also believes that Citizen's refusal to allow a single point of interconnection to the Citizen's network – for carriers such as NTCH that have an interconnection agreement with Citizens – is so commercially unreasonable as to be anticompetitive in its effect.

Respectfully submitted,



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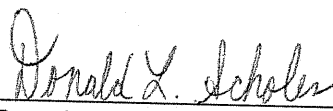
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via fax or hand delivery and U.S. mail to the following on this the 24th day of January, 2003.

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